

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, D.C. 480554

In the Matter of

Amendment of Section 73.622(b),
 Table of Allotments,
 Digital Television Broadcast Stations.
 (Spokane, Washington)

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MB Docket No. 02-222
 RM-10491

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To: Chief, Video Services Division

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

COMMENTS OF KSKN TELEVISION, INC.
IN SUPPORT OF RULE MAKING

KSKN Television, Inc., a subsidiary of Belo Corp. (collectively, "Belo"), by its attorneys and pursuant to Section 1.420 of the Commission's rules, 47 C.F.R. § 1.420, hereby submits its comments in support of the Notice of Proposed Rule Making proposing to amend the Table of Allotments for the digital television ("DTV") service to change the initial DTV channel allotment for station KSKN-DT, Spokane, Washington, from Channel 36 to Channel 48.¹ Belo is the licensee of KSKN(TV), Spokane, Washington, and the petitioner herein.

I. Background

KSKN currently operates on NTSC Channel 22. The station has been allotted DTV Channel 36 for its digital operations. In its Petition for Rule Making dated January 25, 2002 (the "Petition"), which is hereby incorporated by reference into these Comments, Belo proposed changing its DTV channel allotment to Channel 48 so that it can increase power to achieve parity in the Spokane market and provide DTV service to a much greater population.

¹ See Notice of Proposed Rule Making, MB Docket No. 02-222, RM-10491 (rel. August 9, 2002).

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The Petition and accompanying engineering statement also demonstrate that the proposed allotment would be in compliance with the Commission's principal community coverage requirements.² Moreover, the Petition demonstrates that KSKN-DT's proposed channel change will not result in any unacceptable interference to any other authorized DTV broadcast station, DTV allotment or analog television station pursuant to Section 73.623(c)(2) of the Commission's rules.³ Finally, the Petition demonstrates that operation of KSKN-DT on Channel 48 will have no adverse interference effects on any low power television or Class A television facilities.⁴ Accordingly, Belo submits that the substitution of DTV Channel 48 for DTV Channel 36 at Spokane is a preferable use of the digital television spectrum and therefore should be authorized.

II. Intent to Apply and Construct

Belo herein states its present intention to apply for DTV Channel 48 at Spokane, Washington if it is allotted and, if authorized, to build a DTV facility promptly.

² See 47 C.F.R. § 73.625(a).

³ See 47 C.F.R. § 73.623(c)(2).

⁴ In addition, Belo submitted supplemental engineering information demonstrating that, according to Longley-Rice interference studies, no interference will be caused to co-channel Canadian digital allotments in Chilliwack and Cranbrook, British Columbia.

III. Conclusion

For the reasons set forth above, Belo strongly supports the Commission's proposal to amend the DTV Table of Allotments to allot and assign DTV Channel 48 (in lieu of Channel 36) to Spokane, Washington, for use by KSKN-DT.

Respectfully submitted,

KSKN TELEVISION, INC.

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September 30, 2002